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8
9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO COURTHOUSE

12 DELTAWAY OPERATIONS SERVICES,
13 LLC, a California limited liability company,

14 Plaintiff,

15 vs.

16 GLOBAL AMPERSAND, LLC, a Delaware
limited liability company; AKEIDA
17 CAPITAL MANAGEMENT, LLC, a
Delaware limited liability company; DAVID
18 KANDOHLA, an individual; and DOES 1-25,
inclusive;

19 Defendants.
20

Case No. 4:15-cv-04473 YGR

Judge: Hon. Yvonne Gonzalez Rogers

**STIPULATION AND PROPOSED ORDER
RE: CASE MANAGEMENT DEADLINES**

AS MODIFIED BY THE COURT

21
22 WHEREAS on December 22, 2015, the Court denied the Parties' request to extend case
23 management deadlines, but invited the Parties to submit a new request with dates calculated
24 based on a continuance to the case management conference of no more than thirty days; and

25 WHEREAS, the Parties have met and conferred and have selected dates that comport
26 with the schedules of both Parties, and will provide all Parties with sufficient time to review,
27 analyze, and respond to the allegations in Defendants' counterclaims and third-party claims,
28 prepare a diligent Rule 26 report, and participate meaningfully in a Rule 26 Conference;

1 THEREFORE, the Parties hereby agree and stipulate as follows:

2 1. The Parties will meet and confer as required by Fed. R. Civ. P. 26(f)(1) no later
3 than January 14, 2016;

4 2. The Parties will jointly submit a written report to the Court as required by Fed. R.
5 Civ. P. 26(f)(2) no later January 21, 2016;

6 3. The current Rule 26 Conference scheduled for January 11, 2016, should be
7 rescheduled to February 4, 2016;

8 4. The Parties will serve their initial disclosures no later than February 18, 2016; and

9 5. Any response to Defendants' counterclaims and third-party claims will be filed
10 with the Court and served on all Parties no later than February 25, 2016.

11 SO STIPULATED.

12
13 Dated: December 23, 2015

MOSCONE EMBLIDGE & OTIS LLP

14
15 By: /s/ Matthew K. Yan
Matthew K. Yan

16 Attorneys for Plaintiff Deltaway
17 Operations Services, LLC

18 Dated: December 23, 2015

COHEN TAUBER SPIEVACK & WAGNER PC

19 By: /s/ Jay Spievack
20 Jay Spievack

21 Attorneys for Defendants Global
22 Ampersand LLC, Akeida Capital
Management, LLC, and David Kandohla

PROPOSED ORDER

The Court has reviewed and considered the above stipulation and finds good cause to issue the following order:

1. The Parties shall meet and confer as required by Fed. R. Civ. P. 26(f)(1) no later than January 14, 2016;

2. The Parties shall jointly submit a written report to the Court as required by Fed. R. Civ. P. 26(f)(2) no later January 21, 2016;

3. The current Rule 26 Conference scheduled for January 11, 2016, shall be rescheduled to ~~February 4, 2016~~ **February 8, 2016 at 2:00 p.m.;**

4. The Parties shall serve their initial disclosures no later than February 18, 2016; and

5. Any response to Defendants' counterclaims and third-party claims shall be filed with the Court and served on all Parties no later than February 25, 2016.

This Order terminates Docket Number 17.

IT IS SO ORDERED.

Dated: January 5, 2016

By: 
Hon. Yvonne Gonzalez Rogers
U.S. District Court Judge